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VIA ECF

Honorable Lorna G. Schofield
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Carmody v. New York University, et al., No. 1:21-cv-8186 (LGS)

Dear Judge Schofield,

Pursuant to Rule I.D. of Your Honor's Individual Rules of Procedures for Civil Cases, the Electronic Case Filing Rules & Instructions for the Southern District of New York, Section 6, and Standing Order 19-MC-00583, Plaintiff respectfully seeks leave to file the accompanying Exhibits to Plaintiff's Reply Letter in Response to Defendants' January 5, 2023 Letter (the "Exhibits") under seal. The Exhibits contain documents Defendants designated "Confidential" by Defendants. Plaintiffs, however, have no interest in confidential treatment for any Exhibit. Therefore, pursuant to Rule I.D., Defendants bear the burden of persuasion with respect to confidential treatment, and Plaintiff stands ready to file full unredacted copies of the Exhibits via ECF if so ordered.¹

Dated: January 11, 2023

Respectfully submitted,



Damian R. Cavaleri

cc: All counsel of record (*via ECF*)

¹ Plaintiff also attached hereto an Appendix identifying all Parties and Attorneys of Record who should have access to sealed documents.

APPENDIX

Parties:

1. Kristin A. Carmody, M.D., M.H.P.E.
2. New York University
3. NYU Grossman School of Medicine
4. NYU Langone Hospitals
5. Robert I. Grossman, M.D.
6. Fritz Francois, M.D.
7. Steven B. Abramson, M.D.
8. Andrew W. Brotman, M.D.
9. Robert J. Femia, M.D.

Attorneys:

1. Edward Cerasia, II – Cerasia Law LLC
2. Alison L. Tomasco – Cerasia Law LLC
3. Damian R. Cavaleri – Hoguet Newman Regal & Kenney, LLP
4. Wendy Tsang – Hoguet Newman Regal & Kenney, LLP